

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Glenn Mitchell Dennison

Case: 2:22-mj-30314

Assigned To : Unassigned

Assign. Date : 7/22/2022

CMP: USA v DENNISON (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 19, 2022 through July 21, 2022 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2251(a)	Production of child pornography
18 U.S.C. § 2252A(a)(2)	Distribution of child pornography
18 U.S.C. § 2252A(a)(5)(B)	Possession of child pornography
18 U.S.C. § 2260A	Penalties for registered sex offenders

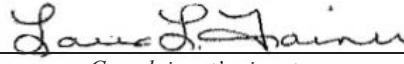
This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

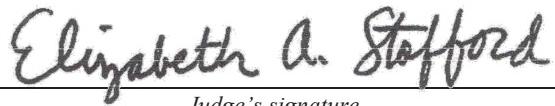
Date: July 21, 2022

City and state: Detroit, Michigan


Laura L. Trainer

Complainant's signature

Laura L. Trainer, Special Agent (HSI)
Printed name and title


Elizabeth A. Stafford

Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Laura L. Trainer, being first duly sworn, state as follows:

INTRODUCTION

1. I am a Special Agent with the Department of Homeland Security Homeland Security Investigations (HSI) in Detroit, Michigan. I have been employed as a Special Agent for HSI since March 2007 and am currently assigned to the Cyber Crimes Group. While employed as a Special Agent by HSI, I have assisted with investigations related to child exploitation and child pornography. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. In June 2019, I successfully completed the International Crimes Against Children (ICAC) Undercover Chatting Investigations training held in Fairfax, Virginia. In August 2020, I attended the Crimes Against Children Conference hosted virtually by the Dallas Children's Advocacy Center.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Glenn Mitchell Dennison** for violations of Title 18, United States Code, Sections 2251(a), 2252A(a)(2), 2252A(a)(5)(B), and 2260A, which make it a crime for any person to knowingly produce, distribute, or

possess child pornography that has been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer, and provide for increased penalties for registered sex offenders for committing certain offenses.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for **Glenn Mitchell Dennison**.

4. Pursuant to the provisions of Title 18, United States Code, Section 2256, "child pornography," as used in this affidavit, includes any visual depiction, including any photograph, film, video, picture, or computer-generated image or picture of sexually explicit conduct where the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct.

BACKGROUND ON NEWGROUNDS.COM

5. Newgrounds is an entertainment website and company founded in 1995. It hosts user-generated content such as games, films, audio, and artwork. The website headquarters and offices are in Glenside, Pennsylvania. The website is free to use and available to the public. Users can create an account by choosing a username and password. Users must provide an email address and a date of birth to complete the account creation process. Once that information is provided, an account is created, and the user has access to the website. User-generated content can be uploaded and categorized into either one of the site's four web portals: Games, Movies, Audio, and Art. Content and context are liable to be reported for review to the moderators and staff members by flagging it for violations to the site's guidelines.

INVESTIGATIVE DETAILS

6. On May 5, 2022, HSI Philadelphia Special Agent (SA) Edward Harris received information that on April 19, 2022, the account “darklightsoul” on a website called “Newgrounds.com” uploaded images to the website that were believed to be illegal. The account was created at 20:02:08 using the email address "hounds*****@protonmail.com" and was logged into seven times between 20:02:08 and 23:23:17. The user made nine blog posts between 20:04:46 and 20:26:33, and appears to have set the posts to “approved comments only”, at which

point they approved seven blog comments between 20:04:57 and 20:06:57 from users. The blog posts only contained pictures, not text. The user posted images in the “Art Gallery” section and used the websites personal storage system to upload additional images. They also uploaded a questionable image as their profile picture. Users were quick to report this account as disturbing, at which time the account was disabled and could not be accessed publicly. The data, which included the dates, times and IP address information that the account was created and logged into as well as the images that were uploaded to the website, were retained and a thumb drive containing the information was given to SA Harris.

7. SA Harris reviewed the images provided from the account and confirmed several of the images met the definition of child pornography. SA Harris obtained a subpoena for the IP address associated with Dennison in the Eastern District of Michigan.

8. SA Harris forwarded the information to HSI Detroit for further investigation. HSI Detroit Special Agent Laura Trainer reviewed the images and determined that they met the federal definition of child pornography.

9. On July 21, 2022, personnel from HSI Detroit executed a federal search warrant at DENNISON’s residence in Novi, Michigan. DENNISON was encountered at the residence.

10. A search of the property was conducted, including a shed located at the back of the residence. SA Alley discovered a black TCL cell phone in a cardboard box in the left rear side. The cell phone was password protected.

11. DENNISON's wife confirmed the cell phone belonged to G. DENNISON, and she stated that he started growing microgreens in the shed about a week ago. DENNISON's wife also confirmed that he has utilized the same username as that used in the distribution of child pornography described above.

12. SA Alley, who is also a Computer Forensic Agent (CFA) conducted a preliminary review of the TCL A509DL cellular telephone found in the shed at the residence and made the following observations:

- a. A one minute 56 second video of an adult male sexually assaulting a prepubescent female child. The male is nude and is wearing what appears to be a Jason Vorhees style hockey mask on his face, a blue covering or wrapping on his right arm and long hair is visible. The child is nude from the waist down and has her mouth gagged with a ball gag around her head. The child screams in distress and attempts to get away from the male during this video as she is forcibly held down on her stomach while her vagina is penetrated. The male then masturbates. This video has a modified date of December 31, 2021, and a file path of storage/emulated/0/DCIM/Camera/VID_20220101_001457. The male in the video matches the description of DENNISON. The child in the video matches the description of a child known to DENNISON.
- b. A 24 second video of a clothed, prepubescent male rubbing and touching an exposed adult male penis. CFA/SA Alley also observed a 14 second video of a clothed prepubescent male rubbing and touching an adult male penis. At the end of the video, the child states "I don't want it in my mouth". CFA/SA Alley also found a 35 second video of this same male putting this penis in his mouth and then continuing to

rub it. A male's voice is heard stating "one more time, hurry up" before the child places the penis in his mouth again. All these videos appear to have a date of May 14, 2022. These videos all have a file path beginning with storage/emulated/0/DCIM/Camera/. The child in the video matches the description of a child known to DENNISON.

- c. A 59 second video that depicts an adult male hand rubbing a prepubescent female's vagina through her underwear. The male then pulls her underwear aside to expose her vagina and penetrates her vagina with his finger. This video appears to have a date of Saturday, May 28, 2022. This video has a file path of storage/emulated/0/DCIM/Camera/VID_20220528_160429.mp4

13. CFA/SA Alley observed approximately 21 images of child pornography on the TCL A509DL with metadata that show that they were created with a "Camera Make" of TCL and a "Camera Model" of A509DL. These images are close ups of what appears to be a prepubescent male's penis as well as what appears to be a prepubescent female vagina. These images may depict two different females. In some of these images, the female's vagina is being touched or spread. In three of the images an adult male penis is observed attempting to penetrate either the female's vagina or anus. These images appear to have been created between May 18, 2022 and June 29, 2022. CFA/SA Alley also observed a selfie style photograph with a "Camera Make" of TCL and a "Camera Model" of A509DL that appears to be a close up of DENNISON's face.

14. I believe DENNISON is the male in the first video based on the long hair that is visible around the hockey mask, body type and the blue tape on his right arm is in the same location that DENNISON has a tattoo. The tattoo was observed by both SA Alley and Trainer during the execution of the search warrant.

15. The above-referenced cellular phone was manufactured outside the state of Michigan.

16. When I took DENNISON into custody, he stated to me, not in the response to any questioning, "I am going to spend the rest of my life in jail."

17. DENNISON is also required to register as a sex offender because of a 2010 conviction for criminal sexual conduct in the second degree.

CONCLUSION

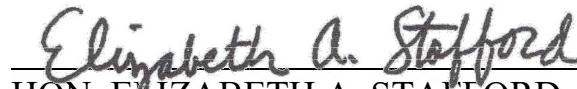
18. I respectfully submit that there is probable cause to believe that Glenn Mitchell DENNISON violated Title 18, United States Code, Sections 2251(a), 2252A(a)(2), 2252A(a)(5)(B), and 2260A, which make it a crime for any person to knowingly produce, distribute, or possess child pornography that has been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer, and provide for increased penalties for registered sex offenders for committing certain offenses.

19. Wherefore by this affidavit and application, I request that the Court authorize the issuance of a criminal complaint and arrest warrant for **Glenn Mitchell DENNISON.**

Respectfully submitted,


Laura L. Trainer, Special Agent
Homeland Security Investigations

Sworn to before me and signed in my presence
and/or by reliable electronic means.


HON. ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: July 21, 2022